

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

HERA WIRELESS S.A. and SISVEL UK LIMITED,	)	
	)	
Plaintiffs,	)	#48
	)	
v.	)	
	)	
AMAZON.COM, INC.	)	
	)	
Defendant.	)	
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HERA WIRELESS S.A. and SISVEL UK LIMITED,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	#51
	)	
ARRIS GROUP, INC.,	)	
	)	
Defendant.	)	
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HERA WIRELESS S.A. and SISVEL UK LIMITED,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	#50
	)	
BELKIN INTERNATIONAL, INC.,	)	
	)	
Defendant.	)	
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HERA WIRELESS S.A. and SISVEL UK LIMITED,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	#49
	)	
NETGEAR, INC.,	)	
	)	
Defendant.	)	

HERA WIRELESS S.A. and SISVEL UK	)
LIMITED,	)
	)
Plaintiffs,	)
	)
v.	) C.A. No. 17-952 (RGA) <i>#48</i>
	)
ROKU, INC.,	)
	)
Defendant.	)
	)

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HERA WIRELESS S.A. and SISVEL UK	)
LIMITED,	)
	)
Plaintiffs,	)
	)
v.	) C.A. No. 17-1088 (RGA) <i>#50</i>
	)
LENOVO HOLDING COMPANY, INC.	)
and LENOVO (UNITED STATES), INC.,	)
	)
Defendants.	)

**STIPULATION AND [PROPOSED] ORDER TO STAY DEADLINES**

WHEREAS, the parties' exchange of proposed claim constructions is due on October 11, 2018 (D.I. 45);<sup>1</sup> a Joint Claim Construction Chart is due to be filed with the Court on October 18, 2018 (D.I. 45); and a *Markman* hearing is scheduled for February 28, 2019 (D.I. 18, ¶ 10); and

WHEREAS, plaintiffs have advised defendants that they recently acquired a new portfolio of patents, and that they currently are conducting an analysis of that portfolio and anticipate seeking to add multiple patents to these cases, but that they need additional time to complete that review and prepare proposed amended complaints;

IT IS HEREBY STIPULATED BY THE PARTIES, subject to the approval of the Court, that:

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<sup>1</sup> Unless otherwise noted, all docket citations are to C.A. No. 17-947.

(1) By November 6, 2018, plaintiffs will provide defendants with the proposed amended complaints they wish to file, including any patents they want to add to these cases;

(2) By December 7, 2018, defendants will advise plaintiffs of their positions with respect to the proposed amended complaints, and the parties will work in good faith to devise a mutually acceptable proposal on how they believe the cases should proceed;

(3) By December 21, 2018, the parties will advise the Court of their proposal(s) on how they believe the cases should proceed; and

(4) All other deadlines and proceedings in these actions are stayed until further order of the Court.

DEVLIN LAW FIRM LLC

/s/ *Timothy Devlin*

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Timothy Devlin (#4241)  
1306 N. Broom Street, 1<sup>st</sup> Floor  
Wilmington, DE 19806  
(302) 449-9010  
tdevlin@devlinlawfirm.com  
*Attorneys for Plaintiffs*

ASHBY & GEDDES

/s/ *Andrew Colin Mayo*

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Steven J. Balick (#2114)  
Andrew Colin Mayo (#5207)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
amayo@ashbygeddes.com  
sbalick@ashbygeddes.com  
*Attorneys for Amazon.com; NETGEAR Inc.  
and Roku, Inc.*

October 8, 2018

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ *Jennifer Ying*

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Jack B. Blumenfeld (#1014)  
Jennifer Ying (#5550)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@mnat.com  
jying@mnat.com  
*Attorneys for Lenovo Holding Company,  
Inc. and Lenovo (United States), Inc.*

DUANE MORRIS LLP

/s/ *Richard L. Renck*

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Richard L. Renck (#3893)  
222 Delaware Avenue  
Suite 1600  
Wilmington, DE 19801-1659  
(302) 657-4906  
rlrenck@duanemorris.com  
*Attorneys for ARRIS Group Inc. and Belkin  
International, Inc.*

DENIED

SO ORDERED, this 9 day of October, 2018

  
United States District Court Judge

1/ I do not see any reason to stay this case simply because Plaintiffs are considering whether to attempt to add more patents to their complaints. The complaints were filed over 14 months ago. These cases have a schedule. They should go ahead. If Plaintiffs have more patents to assert, they can do so in separate complaints.